

March 28, 2003

Mr. Gary Calleo
R. R. Donnelley & Sons Company
1009 Sloan Street
Crawfordsville, IN 47933

Re: 107-16731
First Significant Permit Modification to
Part 70 No.: T107-5963-00052

Dear Mr. Calleo:

R. R. Donnelley & Sons Company was issued a Part 70 permit on June 21, 2002, for a book printing and binding operation. A letter requesting changes to this permit was received on October 31, 2002. The requested changes are related to the pressure drop ranges across the baghouses used in conjunction with dust collectors identified as #1(N), #2(N), #3(N), #1(S), and #2(S). A review of Section D.2 of Part 70 No. 107-5963-00052 revealed that compliance monitoring is not required for the dust collectors identified above, each of which has allowable emissions of less than 10 pounds per hour. According to 326 IAC 2-7-12(d)(1), "every significant change in existing monitoring Part 70 permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions shall be considered significant". The above changes meet this requirement, therefore a significant permit modification will be granted as follows (~~strikeout~~ to show deletions and **bold** to show additions):

(1) Section D.2.4 is modified as follows:

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the ~~baghouses'~~ stack exhausts **for stacks identified as SBP-5H(N), SBP-5I(N), SBP-5J(N), SBP-5K(N), and SBP-5E(S) for Paper Trim Cyclones #1(N), #2(N), #3(N), #4(N), #1(S), #2(S), #3(S) and #4(S)** shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(2) Condition D.2.5, D.2.6, and D.2.7 are deleted.

(3) Condition D.2.8 (re-numbered as D.2.5) is modified as follows:

D.2.8 5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the ~~baghouse~~ stack exhausts **from stacks identified as SBP-5H(N), SBP-5I(N), SBP-5J(N), SBP-5K(N), and SBP-5E(S) for Paper Trim Cyclones #1(N), #2(N), #3(N), #4(N), #1(S), #2(S), #3(S) and #4(S)** when venting to the atmosphere.
- ~~(b) To document compliance with Condition D.2.5, the Permittee shall maintain weekly records of the following operational parameters during normal operation when venting to the atmosphere:~~

~~(A) Inlet and outlet differential static pressure; and~~

~~(B) — Cleaning cycle operation.~~

R. R. Donnelley & Sons Company
Crawfordsville, Indiana

Page 2 of 2
Significant Permit Mod. No. 107-16731-00052

(b e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(3) The Table of Contents is modified as follows:

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations

~~D.2.5 Parametric Monitoring~~

~~D.2.6 Baghouse Inspections~~

~~D.2.7 Broken or Failed Bag Detection~~

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.85 Record Keeping Requirements

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,
Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

mm

cc: File - Montgomery County
U.S. EPA, Region V
Montgomery County Health Department
Air Compliance Section Inspector - Jim Thorpe
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**R.R. Donnelley & Sons Company
1009 Sloan Street
Crawfordsville, Indiana 47933**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T107-5963-00052	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 21, 2002 Expiration Date: June 21, 2007

1st Administrative Amendment No.:107-17119

Issuance Date: Pending

1 st Significant Permit Modification No.: 107-16731	Pages Modified: 3, 33, 34
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:March 28, 2003

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.16 Compliance Response Plan -Preparation, Implementation, Records, and Reports
[326 IAC 2-7-5] [326 IAC 2-7-6]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Natural Gas Fired Boilers

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]
- D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.4 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS - Paper Trim Cyclones and Dust Collectors

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]
- D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.3 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.2.4 Visible Emissions Notations

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.2.5 Record Keeping Requirements

D.3 FACILITY OPERATION CONDITIONS - Printing Presses

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.3.3 Clean-up Solvent VOC Emissions Control
- D.3.4 VOC Emissions
- D.3.5 Particulate Matter (PM) [326 IAC 6-2-3]
- D.3.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.3.7 Particulate Matter (PM)
- D.3.8 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]
- D.3.9 Volatile Organic Compounds (VOC)

R. R. Donnelley & Sons Company
Crawfordsville, Indiana
Permit Reviewer: Teresa Freeman

1st Significant Permit Mod. No. 107-16731
Modified By: Madhurima D. Moulik

Page 33 of 51
OP No. T107-5963-00052

IAC 6-3-2(c)

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.3 Particulate Matter (PM)

The baghouses for PM control shall be in operation and control emissions from the Paper Dust Collectors at all times that the Paper Dust Collectors are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the stack exhausts for stacks identified as SBP-5H(N), SBP-5I(N), SBP-5J(N), SBP-5K(N), and SBP-5E(S) for Paper Trim Cyclones #1(N), #2(N), #3(N), #4(N), #1(S), #2(S), #3(S) and #4(S) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the stack exhausts for stacks identified as SBP-5H(N), SBP-5I(N), SBP-5J(N), SBP-5K(N), and SBP-5E(S) for Paper Trim Cyclones #1(N), #2(N), #3(N), #4(N), #1(S), #2(S), #3(S) and #4(S) when venting to the atmosphere.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

R. R. Donnelley & Sons Company
Crawfordsville, Indiana
Permit Reviewer: Teresa Freeman

1st Significant Permit Mod. No. 107-16731
Modified By: Madhurima D. Moulik

Page 34 of 51
OP No. T107-5963-00052

(Left Blank Intentionally)

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	R. R. Donnelley and Sons Company
Source Location:	1009 Sloan Street, Crawfordsville, IN 47933
County:	Montgomery
SIC Code:	2732
Operation Permit No.:	107-5963-00052
Operation Permit Issuance Date:	June 21, 2002
Permit Modification No.:	107-16731
Permit Reviewer:	Madhurima D. Moulik

The Office of Air Quality (OAQ) has reviewed a modification application from R. R. Donnelley and Sons Company relating to the operation of a book printing and binding operation.

Explanation of Modification

Compliance monitoring is not required for the dust collectors identified as #1(N), #2(N), #3(N), #1(S), and #2(S), each of which has allowable emissions of less than 10 pounds per hour. The compliance monitoring requirements for these units, erroneously included in the Part 70 permit No. 107-5963-00052, are deleted in this significant permit modification.

Justification for the Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d)(1), "every significant change in existing monitoring Part 70 permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions shall be considered significant".

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 31, 2002.

Conclusion

This permit modification shall be subject to the conditions of the attached Part 70 Significant Permit Modification No. 107-16731-00052.